

**THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

	X	
	:	<b>Chapter 9</b>
<b>In re:</b>	:	<b>Case No. 13-53846</b>
<b>CITY OF DETROIT, MICHIGAN,</b>	:	<b>Hon. Steven W. Rhodes</b>
Debtor.	:	
	:	
	:	

**PETITIONER ROBERT DAVIS' MOTION FOR AN *EX PARTE* ORDER TO REDUCE  
THE TIME FOR A PARTY TO TAKE ANY ACTION OR FILE ANY OBJECTIONS TO  
PETITIONER ROBERT DAVIS' EMERGENCY MOTION FOR CLARIFICATION OF  
THE COURT'S JULY 25, 2013 STAY ORDER**

PETITIONER, Robert Davis, by and through his attorney, Andrew A. Paterson, submits this, his Motion for an *Ex Parte* Order Reducing the Time for A Party To Take Any Action or File Any Objections to Petitioner Robert Davis' Emergency Motion for Clarification of the Court's July 25, 2013 Stay Order and states as follows:

1. Pursuant to LBR 9006-1(b), Petitioner Robert Davis (“**Petitioner**”) respectfully requests the Court to enter an *ex parte* order reducing the time for a party to take any action or file any objections to Petitioner Robert Davis' Emergency Motion for Clarification of the Court's July 25, 2014 Stay Order (“**Emergency Motion**”).
2. In accordance with LBR 9006-1(b), on August 8, 2013 Petitioner's legal counsel contacted Michelle Brya, Assistant Attorney General for the State of Michigan, by telephone and sought to obtain her acquiescence with this motion and an accelerated response time if she did not concur. Ms. Brya stated that the Local Emergency Financial Assistance Loan Board, Governor Rick Snyder, and State Treasurer Andy

Dillon are willing to file an accelerated response and that they too seek clarification.

3. It is imperative and urgent for the Court to address the merits of Petitioner's

Emergency Motion for Clarification of the Court's July 25, 2013 Stay Order, because Ingham County Circuit Court Judge, William E. Collette, has temporarily postponed issuing his decision in the Open Meetings Act lawsuit of *Robert Davis v Local Emergency Financial Assistance Loan Board, et al.*, Case No. 13-281-NZ, as a result of the Michigan Attorney General's claim, on behalf of the Local Financial Emergency Loan Board, Governor Rick Snyder and State Treasurer Andy Dillon, that this Court's July 25, 2013 Stay Order may apply to Petitioner's aforementioned Open Meetings Act lawsuit.

4. Accordingly, Petitioner respectfully requests that the Court reduces the time for a party to take action or object to Petitioner's Emergency Motion to three (3) business days.

#### **CONCLUSION/PRAYER FOR RELIEF**

Petitioner, Robert Davis, prays that the Court enters an *ex parte* order reducing the time for a party to take action or object to Petitioner's Emergency Motion to 3 business days.

Respectfully submitted,

/S/ Andrew A. Paterson  
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DATED; August 8, 2013